



11 SEP 2018

Dear [REDACTED]

On 2 July 2018, the Office of Hon Carmel Sepuloni transferred your request to the Ministry, under the Official Information Act 1982, for information relating to sanctions. On 13 July 2018, you refined your request for the following information:

1. *How many benefits were suspended broken down by region between September 2014-2017 during the National Government period?*
 1. *How many people proceeded to review the decision?*
 2. *How many suspensions were overturned upon review?*
 3. *Breakdown of the reasons for the suspensions? (with the 2 person authority, without the 2 person authority and due to excess income)*
 4. *How many of them were performed by the same staff members in an office, to see if it's the same person?*

2. *How many benefits were suspended broken down by region between September 2017-May 2018? (before implementing the 2 person to sanction rule)*
 1. *How many people proceeded to review the decision?*
 2. *How many sanctions were overturned upon review?*
 3. *Breakdown of the reasons for the suspensions? (with the 2 person authority, without the 2 person authority and due to excess income)*
 4. *How many of them were performed by the same staff members in an office, to see if it's the same person?*

3. *How many benefits were suspended broken down by region from June 2018? (after implementing the 2 person sanction rule)*
 1. *How many people proceeded to review the decision?*
 2. *How many sanctions were overturned upon review?*
 3. *Breakdown of the reasons for the suspensions? (with the 2 person authority, without the 2 person authority and due to excess income)*
 4. *How many of them were performed by the same staff members in an office, to see if it's the same person?*

When Work and Income is made aware that a client's circumstances have changed, they work to ensure that the client is receiving their correct entitlement and sometimes they may suspend their benefit to avoid unnecessary debts being

incurred. A suspension of a benefit is where a client's payment has been temporarily stopped.

When it is not clear what a person's entitlement is, staff are expected to make every effort to understand the client's individual circumstances before making the decision to suspend a client's benefit. This may include making contact with the client to have further conversations or asking for follow-up paperwork. Staff members must explore all options. The decision to suspend is not taken lightly and should not be made by a single person alone.

In May 2018, the Minister of Social Development announced changes to strengthen suspension decisions with the aim to ensure that a decision to stop a client's payment is fair and reasonable.

The suspension approval process relates to suspensions that use the reason codes 'lack of representation' or 'other' because in these cases staff members are making discretionary decisions to suspend a benefit. Staff need to explain to a colleague, with designated authority, why they want to use their discretion to suspend the client's benefit for either of these reasons. The staff member with designated authority will not give their approval if the suspension action is not appropriate or there is another process that should be followed.

When a client disagrees with a decision that has been made about their benefit entitlement, they can review that decision. The benefits review process is designed to ensure clients have access to an independent review of entitlement decisions made about their benefit.

Further information regarding the appeals process can be found on the Ministry's website at: www.workandincome.govt.nz/about-work-and-income/complaints/review-of-decisions.html.

Enclosed are the following three tables:

- Table One: The number of benefit suspensions between 1 October 2014 and 30 June 2018, broken down by suspension reason and Work and Income Region.
- Table Two: The number of Review of Decision applications received that relate to a benefit suspension, broken down by suspension reason and Work and Income Region, for the period between 1 October 2014 and 31 July 2018.
- Table Three: The number of Review of Decision applications that relate to a benefit suspension and have been overturned at the Internal Review or Benefit Review Committee stages, broken down by suspension reason and Work and Income Region, for the period between 1 October 2014 and 31 July 2018.

It is important to note that system generated suspensions can occur for all reason codes. Table One has been broken down by automated and manual user suspensions. 'Auto' shows the number of system generated suspensions and 'User' shows those that have been manually suspended by Ministry staff. System generated suspensions can include where a review of benefit is due and the review form has not yet been received from the client, or if a Case Manager has loaded a suspension to action at a future date.

I am unable to provide you with details about the staff members who have performed suspensions as it is held in notes on individual case files. In order to provide you with this information Ministry staff would have to create reporting and would require staff to manually review thousands of files to ensure it is robust. As such I refuse your request under section 18(f) of the Official Information Act. The greater public interest is in the effective and efficient administration of the public service.

I have considered whether the Ministry would be able to respond to your request given extra time, or the ability to charge for the information requested. I have concluded that, in either case, the Ministry's ability to undertake its work would still be prejudiced.

The principles and purposes of the Official Information Act 1982 under which you made your request are:

- to create greater openness and transparency about the plans, work and activities of the Government,
- to increase the ability of the public to participate in the making and administration of our laws and policies and
- to lead to greater accountability in the conduct of public affairs.

This Ministry fully supports those principles and purposes. The Ministry therefore intends to make the information contained in this letter and any attached documents available to the wider public shortly. The Ministry will do this by publishing this letter and attachments on the Ministry of Social Development's website. Your personal details will be deleted and the Ministry will not publish any information that would identify you as the person who requested the information.

If you wish to discuss this response with us, please feel free to contact OIA_Requests@msd.govt.nz.

If you are not satisfied with this response concerning benefit suspensions, you have the right to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz or 0800 802 602.

Yours sincerely



Kay Read
Group General Manager Client Service Delivery

Table One: The number of benefit suspensions between 1 October 2014 and 30 June 2018, broken down by suspension reason and Work and Income Region.

Region	Period	Reason for suspension by processing user											
		Lack of representation / Other			Excess income			All other reasons			Total		
		Auto		User	Auto		User	Auto		User	Auto		User
		#	% by User	#	% by User	#	% by User	#	% by User	#	% by User	#	% by User
Northland	1 October 2014 to 30 September 2015	45	1,456	97	16	995	98.4	237	14,317	98.4	298	16,768	98.3
	1 October 2015 to 30 September 2016	544	1,573	74.3	249	1,033	80.6	2,937	11,859	80.2	3,730	14,465	79.5
	1 October 2016 to 30 September 2017	1,045	999	48.9	790	814	50.7	6,868	7,513	52.2	8,703	9,326	51.7
	1 October 2017 to 31 May 2018	710	376	34.6	580	453	43.9	5,457	4,261	43.8	6,747	5,090	43
	1 June 2018 to 30 June 2018	57	16	21.9	56	37	39.8	696	491	41.4	809	544	40.2
Total		2,401	4,420	64.8	1,691	3,332	66.3	16,195	38,441	70.4	20,287	46,193	69.5
Auckland Metro	1 October 2014 to 30 September 2015	280	9,219	97.1	151	6,551	97.7	1,642	89,353	98.2	2,073	105,123	98.1
	1 October 2015 to 30 September 2016	2,607	9,534	78.5	1,159	6,183	84.2	13,776	74,842	84.5	17,542	90,559	83.8
	1 October 2016 to 30 September 2017	5,174	6,319	55	3,419	5,172	60.2	30,640	50,621	62.3	39,233	62,112	61.3
	1 October 2017 to 31 May 2018	3,866	2,793	41.9	2,684	2,670	49.9	25,966	28,806	52.6	32,516	34,269	51.3
	1 June 2018 to 30 June 2018	348	148	29.8	295	248	45.7	3,476	2,898	45.5	4,119	3,294	44.4
Total		12,275	28,013	69.5	7,708	20,824	73	75,500	246,520	76.6	95,483	295,357	75.6
Waikato	1 October 2014 to 30 September 2015	90	2,155	96	34	1,601	97.9	315	21,565	98.6	439	25,321	98.3
	1 October 2015 to 30 September 2016	657	2,398	78.5	338	1,751	83.8	3,259	19,290	85.5	4,254	23,439	84.6
	1 October 2016 to 30 September 2017	1,580	1,543	49.4	1,180	1,487	55.8	9,682	12,220	55.8	12,442	15,250	55.1
	1 October 2017 to 31 May 2018	1,145	652	36.3	891	772	46.4	7,759	6,779	46.6	9,795	8,203	45.6
	1 June 2018 to 30 June 2018	75	39	34.2	99	88	47.1	948	793	45.5	1,122	920	45.1
Total		3,547	6,787	65.7	2,542	5,699	69.2	21,963	60,647	73.4	28,052	73,133	72.3

Table continued overleaf.

Region	Period	Reason for suspension by processing user												Total	
		Lack of Representation / Other			Excess Income			All Other Reasons							
		User		Auto	User		Auto	User		Auto	User		Auto	User	
		#	% by User	#	#	% by User	#	#	% by User	#	#	% by User	#	#	% by User
Bay of Plenty	1 October 2014 to 30 September 2015	61	2,938	98	24	2,364	99	335	26,949	98.8	420	32,251	98.7		
	1 October 2015 to 30 September 2016	650	4,048	86.2	242	2,344	90.6	2,547	24,322	90.5	3,439	30,714	89.9		
	1 October 2016 to 30 September 2017	1,476	4,437	75	834	2,091	71.5	7,053	17,273	71	9,363	23,801	71.8		
	1 October 2017 to 31 May 2018	976	1,469	60.1	754	1,303	63.3	5,860	10,857	64.9	7,590	13,629	64.2		
	1 June 2018 to 30 June 2018	82	47	36.4	83	124	59.9	747	1,187	61.4	912	1,358	59.8		
	Total	3,245	12,939	79.9	1,937	8,226	80.9	16,542	80,588	83	21,724	101,753	82.4		
East Coast	1 October 2014 to 30 September 2015	31	1,950	98.4	7	1,276	99.5	178	17,656	99	216	20,882	99		
	1 October 2015 to 30 September 2016	440	2,175	83.2	210	1,286	86	2,430	16,130	86.9	3,080	19,591	86.4		
	1 October 2016 to 30 September 2017	1,005	1,329	56.9	890	1,169	56.8	7,544	10,073	57.2	9,439	12,571	57.1		
	1 October 2017 to 31 May 2018	723	697	49.1	762	694	47.7	5,901	6,078	50.7	7,386	7,469	50.3		
	1 June 2018 to 30 June 2018	64	26	28.9	66	52	44.1	653	557	46	783	635	44.8		
	Total	2,263	6,177	73.2	1,935	4,477	69.8	16,706	50,494	75.1	20,904	61,148	74.5		
Taranaki	1 October 2014 to 30 September 2015	25	1,182	97.9	11	1,170	99.1	148	11,551	98.7	184	13,903	98.7		
	1 October 2015 to 30 September 2016	332	1,367	80.5	135	1,255	90.3	1,548	11,127	87.8	2,015	13,749	87.2		
	1 October 2016 to 30 September 2017	764	989	56.4	615	1,346	68.6	3,978	8,477	68.1	5,357	10,812	66.9		
	1 October 2017 to 31 May 2018	453	486	51.8	462	866	65.2	3,021	5,633	65.1	3,936	6,985	64		
	1 June 2018 to 30 June 2018	37	26	41.3	65	90	58.1	378	605	61.5	480	721	60		
	Total	1,611	4,050	71.5	1,288	4,727	78.6	9,073	37,393	80.5	11,972	46,170	79.4		
Central	1 October 2014 to 30 September 2015	41	1,567	97.5	12	1,601	99.3	185	16,131	98.9	238	19,299	98.8		
	1 October 2015 to 30 September 2016	517	1,644	76.1	308	1,696	84.6	2,464	13,740	84.8	3,289	17,080	83.9		
	1 October 2016 to 30 September 2017	950	1,099	53.6	1,161	1,286	52.6	6,983	8,219	54.1	9,094	10,604	53.8		
	1 October 2017 to 31 May 2018	679	425	38.5	860	693	44.6	5,739	4,047	41.4	7,278	5,165	41.5		
	1 June 2018 to 30 June 2018	45	22	32.8	95	52	35.4	708	449	38.8	848	523	38.1		
	Total	2,232	4,757	68.1	2,436	5,328	68.6	16,079	42,586	72.6	20,747	52,671	71.7		

Table continued overleaf.

Region	Period	Reason for suspension by processing user											
		Lack of Representation / Other			Excess Income			All Other Reasons			Total		
		Auto		User	Auto		User	Auto		User	Auto		User
		#	% by User	#	% by User	#	% by User	#	% by User	#	% by User	#	% by User
Wellington	1 October 2014 to 30 September 2015	83	1,767	95.5	60	2,083	97.2	579	20,289	97.2	722	24,139	97.1
	1 October 2015 to 30 September 2016	526	2,013	79.3	540	2,322	81.1	3,297	17,661	84.3	4,363	21,996	83.4
	1 October 2016 to 30 September 2017	976	1,491	60.4	1,227	2,430	66.4	6,188	12,892	67.6	8,391	16,813	66.7
	1 October 2017 to 31 May 2018	611	634	50.9	657	1,456	68.9	4,252	8,245	66	5,520	10,335	65.2
	1 June 2018 to 30 June 2018	54	37	40.7	75	118	61.1	527	986	65.2	656	1,141	63.5
Total		2,250	5,942	72.5	2,559	8,409	76.7	14,843	60,073	80.2	19,652	74,424	79.1
Nelson	1 October 2014 to 30 September 2015	24	1,153	98	32	1,344	97.7	124	9,494	98.7	180	11,991	98.5
	1 October 2015 to 30 September 2016	343	1,217	78	174	1,337	88.5	1,069	8,436	88.8	1,586	10,990	87.4
	1 October 2016 to 30 September 2017	576	894	60.8	567	1,288	69.4	2,568	6,000	70	3,711	8,182	68.8
	1 October 2017 to 31 May 2018	471	363	43.5	551	637	53.6	2,417	3,087	56.1	3,439	4,087	54.3
	1 June 2018 to 30 June 2018	39	20	33.9	55	64	53.8	285	367	56.3	379	451	54.3
Total		1,453	3,647	71.5	1,379	4,670	77.2	6,463	27,384	80.9	9,295	35,701	79.3
Canterbury	1 October 2014 to 30 September 2015	93	2,429	96.3	42	2,003	97.9	428	16,578	97.5	563	21,010	97.4
	1 October 2015 to 30 September 2016	869	2,632	75.2	409	1,964	82.8	3,521	15,847	81.8	4,799	20,443	81
	1 October 2016 to 30 September 2017	1,633	1,607	49.6	1,352	1,812	57.3	8,331	10,993	56.9	11,316	14,412	56
	1 October 2017 to 31 May 2018	1,111	700	38.7	988	1,116	53	6,311	6,504	50.8	8,410	8,320	49.7
	1 June 2018 to 30 June 2018	113	51	31.1	116	89	43.4	891	617	40.9	1,120	757	40.3
Total		3,819	7,419	66	2,907	6,984	70.6	19,482	50,539	72.2	26,208	64,942	71.2
Southern	1 October 2014 to 30 September 2015	42	1,764	97.7	35	2,258	98.5	257	15,901	98.4	334	19,923	98.4
	1 October 2015 to 30 September 2016	432	1,913	81.6	274	2,625	90.5	1,539	14,846	90.6	2,245	19,384	89.6
	1 October 2016 to 30 September 2017	881	1,389	61.2	995	2,570	72.1	4,311	10,946	71.7	6,187	14,905	70.7
	1 October 2017 to 31 May 2018	625	566	47.5	1,009	1,235	55	4,017	6,199	60.7	5,651	8,000	58.6
	1 June 2018 to 30 June 2018	41	45	52.3	67	161	70.6	299	789	72.5	407	995	71
Total		2,021	5,677	73.7	2,380	8,849	78.8	10,423	48,681	82.4	14,824	63,207	81

Table continued overleaf.

Region	Period	Reason for suspension by processing user												Total		
		Lack of Representation / Other			Excess Income			All Other Reasons								
		Auto		User	Auto		User	Auto		User	Auto		User	Auto		User
		#	#	% by User	#	#	% by User	#	#	% by User	#	#	% by User	#	#	% by User
Other	1 October 2014 to 30 September 2015	939	4,397	82.4	269	1,770	86.8	3,816	14,427	79.1	5,024	20,594	80.4			
	1 October 2015 to 30 September 2016	1,891	2,254	54.4	513	1,273	71.3	5,801	6,891	54.3	8,205	10,418	55.9			
	1 October 2016 to 30 September 2017	3,338	610	15.5	1,452	298	17	11,304	2,493	18.1	16,094	3,401	17.4			
	1 October 2017 to 31 May 2018	2,766	431	13.5	1,278	219	14.6	7,001	1,186	14.5	11,045	1,836	14.3			
	1 June 2018 to 30 June 2018	255	15	5.6	43	6	12.2	525	64	10.9	823	85	9.4			
	Total	9,189	7,707	45.6	3,555	3,566	50.1	28,447	25,061	46.8	41,191	36,334	46.9			
All	1 October 2014 to 30 September 2015	1,754	31,977	94.8	693	25,016	97.3	8,244	274,211	97.1	10,691	331,204	96.9			
	1 October 2015 to 30 September 2016	9,808	32,768	77	4,551	25,069	84.6	44,188	234,991	84.2	58,547	292,828	83.3			
	1 October 2016 to 30 September 2017	19,398	22,706	53.9	14,482	21,763	60	105,450	157,720	59.9	139,330	202,189	59.2			
	1 October 2017 to 31 May 2018	14,136	9,592	40.4	11,476	12,114	51.4	83,701	91,682	52.3	109,313	113,388	50.9			
	1 June 2018 to 30 June 2018	1,210	492	28.9	1,115	1,129	50.3	10,133	9,803	49.2	12,458	11,424	47.8			
	Total	46,306	97,535	67.8	32,317	85,091	72.5	251,716	768,407	75.3	330,339	951,033	74.2			

Notes:

- These figures will not solely reflect the impact of the recent changes to strengthen suspension decisions. There is an on-going trend for increased automation over time which is reflected in these figures.
- There are seasonal impacts on suspensions which are not obvious in these figures.
- Number of suspensions for a short time period cannot be used to estimate what they might be over a calendar year.
- The time periods are non-standard Ministry reporting. These numbers will not match official figures.
- 'User' is where the suspension is entered by a human user into the Ministry's records.
- The alternative 'Auto' is where the suspension was entered via an automated machine process subject to standard business rules.
- Some automated entries are initiated by user actions.
- '#' is the number of suspensions. This is a count of suspensions, not a count of clients.
- '% by User' is the number of suspensions recorded as entered by a human user divided by the total number of suspensions for that time period. The percentage by user is an approximation for the actual proportion of suspensions entered by Ministry staff.
- Lack of Representation / Other are those decisions subject to the two person rule.
- Region "Other" is Call Centres, Centralised Processing Centres, StudyLink Processing Centre, Investigation teams and other groups.
- Suspensions include suspensions for New Zealand Superannuation, Veterans Pension, Job Seeker Support, Supported Living Payments, Supported Living Payments Overseas, Orphans Benefit, Unsupported Childs Benefit, Sole Parent Support, Sole Parent Support Overseas, Widows Benefit Overseas, Emergency Maintenance Allowance, Emergency Benefit, Job Seeker Hardship, Youth Payment, Young Parent Payment, and Non Beneficiaries.

Table Two: The number of Review of Decision (ROD) applications received that relate to a benefit suspension, broken down by suspension reason and Work and Income Region, for the period between 1 October 2014 and 31 July 2018.

Region	1 October 2014 to 31 September 2017			1 October 2017 to 31 May 2018			1 June 2018 to 31 July 2018					
	All suspension RODs	Excess income	Lack of reps	Other	All suspension RODs	Excess income	Lack of reps	Other	All suspension RODs	Excess income	Lack of reps	Other
Auckland	141	13	4	50	71	9	3	15	14	2	1	6
Bay of Plenty	37	5	3	6	6	1	0	0	0	0	0	0
Canterbury	69	8	3	11	18	0	0	3	3	1	0	0
Central	39	4	5	11	15	2	0	2	0	0	0	0
East Coast	17	2	1	9	3	1	0	0	3	0	0	1
Nelson	16	1	0	2	6	1	0	1	1	1	0	0
Northland	33	11	1	10	12	6	2	4	7	0	1	2
Southern	25	2	1	8	3	0	0	0	0	0	0	0
Taranaki	8	0	1	2	2	1	0	0	0	0	0	0
Waikato	22	2	1	4	7	0	0	1	1	0	0	0
Wellington	168	12	3	33	30	0	0	3	10	0	0	1
Total	748	60	23	146	173	21	5	29	39	4	2	10

Notes:

- 'Lack of Representations' reason code is grouped with "costs not verified" and therefore these figures are Lack of representation/costs not verified.

Table Three: The number of Review of Decision (ROD) applications that relate to a benefit suspension and have been overturned at the Internal Review or Benefit Review Committee stages, broken down by suspension reason and Work and Income Region, for the period between 1 October 2014 and 31 July 2018.

Region	1 October 2014 to 31 September 2017				1 October 2017 to 31 May 2018			1 June 2018 to 31 July 2018				
	All suspension RODs	Excess income	Lack of reps	Other	All suspension RODs	Excess income	Lack of reps	Other	All suspension RODs	Excess income	Lack of reps	Other
Auckland	53	0	2	15	22	1	1	2	3	0	0	1
Bay of Plenty	10	2	0	3	2	0	0	0	0	0	0	0
Canterbury	38	0	1	7	11	0	0	2	2	0	0	0
Central	17	1	0	6	4	1	0	0	0	0	0	0
East Coast	7	0	0	4	3	1	0	0	1	0	0	0
Nelson	12	1	0	0	1	0	0	1	0	0	0	0
Northland	2	0	0	0	0	0	0	0	1	0	0	0
Southern	14	1	1	1	2	0	0	1	0	0	0	0
Taranaki	6	0	1	1	1	0	0	0	0	0	0	0
Waikato	11	0	1	1	0	0	0	0	0	0	0	0
Wellington	24	1	0	4	7	0	0	0	0	0	0	0
Other	76	5	3	11	28	3	0	10	6	2	1	2
Total	270	11	9	53	81	6	1	16	13	2	1	3

Notes:

- 'Lack of Representations' reason code is grouped with "costs not verified" and therefore these figures are Lack of representation/costs not verified.